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BY: _____

1 Marsha E. Mullin (SBN 93709)
2 ALSTON & BIRD, LLP
3 333 S. Hope Street
4 Sixteenth Floor
5 Los Angeles, California 90071
6 Telephone: (213) 576-1000
7 Facsimile: (213) 576-1100
8 Email: marsha.mullin@alston.com

9 Attorneys for Plaintiff,
10 NOKIA CORPORATION

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

CV11 03860 CAS (FFMx)

Case No.:

Underlying Case in the District of
Delaware
Civil Action No. 09-791-GMS
Assigned to: Gregory M. Sleet

PLAINTIFF NOKIA
CORPORATION'S NOTICE OF
MOTION TO COMPEL THIRD
PARTY BROADCOM
CORPORATION'S PRODUCTION
OF DOCUMENTS

Discovery Cutoff: July 15, 2011
Pretrial Conference: May 1, 2012
Trial: May 21, 2012

Date: June 7, 2011
Time: 10:00 a.m.
Place: Spring St. E

Judge Mumm

13 NOKIA CORPORATION,

14 Plaintiff,

15 v.

16 APPLE INC.,

17 Defendant.

18 APPLE INC.,

19 Counterclaim-Plaintiff,

20 v.

21 NOKIA CORPORATION and NOKIA
22 INC.,

23 Counterclaim-Defendants.
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TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on June 6, 2011, at 10:00 a.m., or as soon thereafter as this matter may be heard in the above entitled Court, located at 312 North Spring Street, Los Angeles, California, plaintiff Nokia Corporation ("Nokia") will and hereby does move the Court under Federal Rule of Civil Procedure 37 to compel the production of documents from third-party Broadcom Corporation ("Broadcom"). This motion is made on the grounds that Broadcom's conduct in the present action has so far mirrored the delay tactics it used against Nokia in two related proceedings Nokia brought against Apple Inc. -- an ITC Investigation and another District Court action. Nokia therefore brings this motion to compel Broadcom to produce by a date certain (*i.e.*, June 10, 2011) documents responsive to the document requests set forth in the subpoena for deposition testimony and document production served on Broadcom on March 22, 2011.

This Motion is made following the conference of counsel pursuant to L.R. 37-1 which took place on April 13, 2011. During that meeting, counsel for Nokia and counsel for Broadcom conferred but have been unable to reach agreement regarding the issues set forth herein.

This Motion is based on this Notice of Motion, the Joint Stipulation of the Parties, the attached Declarations of Coby S. Nixon, Ross R. Barton and Stephen G. McNiff and all exhibits thereto, and all pleadings and papers filed and upon such other matters as may be presented to or considered by the Court.

DATED: May 4, 2011

Respectfully Submitted,
MARSHA E. MULLIN
ALSTON + BIRD LLP



Marsha E. Mullin

Attorneys for Plaintiff
NOKIA CORPORATION